

**You IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

TAPESTRY, INC.,

and

CAPRI HOLDINGS LIMITED,

Defendants.

Case. No.: 1:24-cv-03109-JLR

**DECLARATION OF DANIELLE C. QUINN IN SUPPORT OF PLAINTIFF FEDERAL  
TRADE COMMISSION'S MEMORANDUM OF LAW IN OPPOSITION TO  
DEFENDANTS' MOTION FOR A MORE DEFINITE STATEMENT OR, IN THE  
ALTERNATIVE, TO REQUIRE PLAINTIFF TO ANSWER ONE CONTENTION  
INTERROGATORY**

I, Danielle Quinn, an attorney acting on behalf of the United States government, declare that the following is true and correct under penalty of perjury.

1. I am an attorney at the Federal Trade Commission (the "Commission" or "FTC"), Bureau of Competition, and counsel for Plaintiff FTC in the above-captioned matter. I have personal knowledge of the facts set forth in this declaration. I submit this declaration in support of the FTC's Memorandum of Law in Opposition to Defendants' Motion for a More Definite Statement Or, in the Alternative, to Require Plaintiff to Answer One Contention Interrogatory.
2. Attached hereto as **Exhibit A** is a true and correct copy of Tapestry Inc's Securities and Exchange Commission 8-K filing, dated April 22, 2024.
3. Attached hereto as **Exhibit B** is a true and correct copy of Capri Holdings Limited's

Securities and Exchange Commission 8- filing dated April 22, 2024.

4. Attached hereto as **Exhibit C** is a true and correct copy of a redlined [Proposed] Case Management and Scheduling Order sent via electronic email to the FTC from Chris Brown, counsel for Tapestry, Inc., at 2:28PM ET on April 26, 2024.
5. Attached hereto as **Exhibit D** is a true and correct copy of the transcript of the court proceedings before the Honorable Jennifer L. Rochon, dated April 29, 2024.
6. Attached hereto as **Exhibit E** is a true and correct copy of a redlined [Proposed] Case Management and Scheduling Order sent via electronic email to counsel for Tapestry, Inc. and Capri Holdings Limited from Danielle Quinn, on behalf of the FTC, at 1:27PM ET on April 30, 2024.
7. On April 30, 2024, after the FTC circulated a revised CMSO proposal, the parties met and conferred at 1:30pm ET. During this meet and confer, the parties discussed Defendants' planned motion for a more definite statement and the FTC's revised proposed CMSO circulated the same day. During that conversation, the FTC raised that certain of the information for a more definite statement that Defendants requested on that call—including their demands for the FTC's market shares and Herfindahl-Hirschman Index ("HHI") calculations—were premature expert discovery. Despite discussing both Defendants' proposed motion for a more definite statement and the CMSO, Defendants did not seek relief from Local Rule 33.3 or the CMSO provisions concerning contention interrogatories.
8. Attached hereto as **Exhibit F** is a true and correct copy of a redlined [Proposed] Case Management and Scheduling Order sent via electronic mail to the FTC from Chris Brown, counsel to Tapestry, Inc. at 5:33PM ET on April 30, 2024.

9. Attached hereto as **Exhibit G** is a true and correct copy of Defendant Tapestry Inc.'s Rule 26(a) Initial Disclosures, dated May 7, 2024.
10. Attached hereto as **Exhibit H** is a true and correct copy of Defendant Capri Holdings Limited's Rule 26(a) Initial Disclosures, dated May 7, 2024.
11. Attached hereto as **Exhibit I** is a true and correct copy of the complaint filed in *United States v. Bertelsmann SE & Co. KGaA*, No. 21-2886-FYP (D.D.C.), Dkt. No. 1.

Pursuant to 28 U.S.C. § 1746, I state under penalty of perjury that the foregoing is true and correct.

Dated: May 8, 2024

Respectfully submitted,

S/ Danielle C. Quinn

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